



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**FEE**

**DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

BARCODE: 447049; DECISION: 538122; FILE No. 91234-TE; PRIA CODE R301 PC CODE: 107091  
PRODUCT NAME: A221.02; Food Use: Yes

DATE: May 21, 2018

SUBJECT: Product Chemistry Review of A221.02

FROM: Akiva Abramovitch, Ph.D.  
CITAB/RD (7505P) *A*

THROUGH: Shyam B. Mathur, Ph.D.  
Product Chemistry Team Leader  
CITAB/RD (7505P) *S B Mathur 5/21/18*

TO: Marianne Lewis, Reviewer / Venus Eagle, Product Manager, RM 01  
IVB3/ RD (7505P)

REGISTRANT: ATTICUS LLC

USE: Insecticide-End use product

MRID Numbers: 504760-01 through -02

**INTRODUCTION:**

The registrant is seeking the registration of a new product containing Etoxazole. In support of this petition, the registrant has submitted a draft label, Group A & B product chemistry data and a basic CSF dated January 29, 2018.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredients: Etoxazole (31.7%)
2. Has the registrant claimed substantial similarity to a registered product?  
[ ] Yes; [X] No; [ ] NA; if yes give the registration number of the cited product.  
EPA Reg. No.
3. All of the source materials of the active ingredient are derived from registered sources [X] Yes  
[ ] No
4. All inert ingredients have been screened by IIAB and are approved for the proposed labeled uses.  
[X] Yes [ ] No
5. Confidential Statement of Formula:  
[X] Basic - Dated: January 29, 2018  
[ ] Alternate CSF#1 Dated: Resubmitted Dated:

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Alternate CSF complies with 40 CFR 152.43

☐ Yes ☐ No ☒ NA

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF concurs with product label (PR Notice 91-2).  
☒ Yes; ☐ No ☐ if not, explain below: Justification provided for one of the ingredient wider limits.

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)  
☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA  
Soluble arsenic: ☐ Yes ☒ NA  
Isomeric ratios: ☐ Yes ☒ NA  
Acid Equivalent: ☐ Yes ☒ NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☒ No; ☐ NA  
Methanol at > 4%: ☐ Yes; ☒ No; ☐ NA  
Sodium nitrate/sodium nitrite ☐ Yes; ☒ No; ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?  
☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?  
☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	504760-01
830.1600	Description of materials used to produce the product		X		A	504760-01
830.1650	Description of formulation process		X		A	504760-01
830.1670	Discussion on the formation of impurities		X		A	504760-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	504760-01
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	504760-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB Assessment of Data	MRID Nos.
830.6303	Physical State	White color liquid with a weak pungent odor	A	504760-02
830.6314	Oxidation/Reduction	Product is non-reactive to oxidizing and reducing agents	A	504760-02
830.6315	Flammability	Not flammable-flash point above 91.2 C	A	504760-02
830.6316	Explodability	Product does not have explosive properties.	W	
830.6317	Storage stability	Stable. No change in appearance and composition when stored for two weeks at 54 C	A	504760-02
830.6320	Corrosion Characteristics	There was no change in the storage container or the product when stored for two weeks at 54 C	A	504760-02
830.7000	pH	7.1	A	504760-02
830.7100	Viscosity	0.724 Pa-s at 20 C and 0.637 Pa-s at 40C	A	504760-02
830.7300	Density (units)	1.085 g/cm <sup>3</sup> at 20 C	A	504760-02

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**CONCLUSIONS:**

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

**A. Substantial similarity to the cited product (Reg. No.) from Product chemistry view point**

- ☐ Similar
- ☐ Not similar, give reasons:
- ☐ Identical
- ☐ Not identical
- ☒ Not applicable

**B. Confidential Statement of formula**

Basic CSF (dated January 29, 2018)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

Alternate CSF #1 (dated )

- ☐ Acceptable -
- ☐ Not Acceptable -
- ☒ Not Applicable

If not acceptable give reasons

**C. Group A Product Chemistry Data**

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s):
- ☐ Not required
- ☐ Data cited

**D. Group B Product chemistry data**

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s):
- ☐ Not required
- ☐ Data cited

**E. Product Label/Draft Label**

Recommendations – Yes ☐; No ☒

*\*Confidential Statement of Formula may be entitled to confidential treatment\**

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